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UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY PRODUCTS  
LIABILITY LITIGATION

## This Document Relates To:

## ALL ACTIONS

MDL No. 3047

Case No. 4:22-md-03047-YGR (PHK)

## **JOINT STATUS REPORT ON FORENSIC IMAGING AND DEVICE DATA**

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

Pursuant to Discovery Management Order No. 8 (Dkt. 1025) (“DMO No. 8”), the Parties jointly provide this report on Plaintiffs’ progress with respect to production, and the Parties’ progress in conferring on certain topics as directed by the Court.

As an initial matter, the Court ordered Plaintiffs to “produce a list of every model number of every relevant Bellwether PI Plaintiffs’ device” and “a full list and chart to Defendants of all the applications which are currently on the relevant Bellwether PI Plaintiffs’ devices Dkt. 1025, at 5-6. On July 15, 2024, Defendants sent Plaintiffs the draft Status Report Table attached at Appendix A and requested that Plaintiffs complete the table and meet-and-confer regarding other items discussed during the July 11, 2024 discovery management conference related to identification of the Plaintiffs’ devices and the forensic images from those devices.

Today, Plaintiffs produced a spreadsheet to Defendants that Plaintiffs represent to includes device model numbers and the application lists available to Plaintiffs for nearly all Plaintiffs’ devices, as defined by DMO No. 8, at 8, with the exception of a few devices that are not accessible currently due to technical issues. Plaintiffs represent that they will supplement this disclosure as additional information becomes available and note that information on non-primary devices, including their model numbers, has been provided in responses to Defendants’ first set of interrogatories. Plaintiffs for whom responses to Defendants’ first set of interrogatories are not yet due will respond in accordance with their due dates.<sup>1</sup> Because the spreadsheet was only recently received, Defendants are reviewing and will evaluate the information just produced. The Parties intend to meet and confer further on the identification of relevant devices and applications.

Plaintiffs have not produced, and the Parties have not yet conferred on: (1) the data sets Plaintiffs discussed during the July 11 hearing, including “application usage data, browser history data, location data, communication logs, media files, metadata, application settings, and other data files reasonably and in good faith identified by Defendants as relevant to how the device user used that device during the

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<sup>1</sup> Defendants note that the Court instructed Plaintiffs, “don’t wait, start producing [this information] on a rolling basis and disclosing it now if you have it.” Tr. at 42:4–5. Accordingly, Defendants do not agree that Plaintiffs should wait until their responses to Defendants’ interrogatories are due to provide this information if it is available sooner.

relevant time period" (*id.* at 6); (2) search terms to be used for content-based material, such as email and text messages, because Defendants just today provided proposed terms to those that Plaintiffs proposed on June 19, 2024 (*see id.* at 7); and (3) the identification of various relevant settings for each device and what databases are on the devices (*id.* at 6).

The Parties will continue to meet and confer in good faith in accordance with DMO No. 8 and will provide the Court with a Supplement Status Report regarding the above items on July 26, 2024.

Respectfully submitted,

DATED: July 19, 2024

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I, Andrea R. Pierson, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to  
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Dated: July 19, 2024

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